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14

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION  
18

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 ROBERT JACOBSEN,

23 Defendant.  
24

Case No. 3:15-cr-00518-MMC-1

**[PROPOSED] STIPULATED ORDER  
MODIFYING CONDITIONS OF  
PRETRIAL RELEASE**

25 The parties hereby stipulate and move this Court to enter an order allowing Defendant  
26 Robert Jacobsen to travel from the San Francisco Bay Area to Escondido, California, from and

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28 /////

1 including November 2, 2016, to and including November 9, 2016. The purpose of the trip is for  
 2 Mr. Jacobsen to visit and care for a close friend who is in the end stages of his battle with cancer.<sup>1</sup>

3 Mr. Jacobsen is currently out of custody awaiting trial. The conditions of his pretrial  
 4 release currently impose a curfew and limit his travel to the Northern District of California.  
 5 Mr. Jacobsen is under the supervision of Pretrial Services and has had no violations of the terms of  
 6 his pretrial release. His Pretrial Services Officer, Timothy Elder, does not object to this request.

7 **IT IS SO STIPULATED.**

8 DATED: November 1, 2016

Respectfully submitted,

10 By: /s/ Benjamin Kingsley  
 11 BENJAMIN KINGSLEY  
 Assistant United States Attorney

12 DATED: November 1, 2016

Respectfully submitted,

14 COBLENTZ PATCH DUFFY & BASS LLP

15 By: /s/ Timothy P. Crudo  
 16 Timothy P. Crudo  
 17 Attorneys for Defendant  
 ROBERT JACOBSEN

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 25 <sup>1</sup> To protect his privacy, we have not identified Mr. Jacobsen's friend in this public filing. The  
 26 Pretrial Services Officer and the Government have been informed of the identity of Mr. Jacobsen's  
 27 friend, and if requested Mr. Jacobsen will provide that information to the Court, although he  
 28 would ask to do so under seal.

**[PROPOSED] ORDER**

GOOD CAUSE HAVING BEEN SHOWN, **IT IS ORDERED** that Defendant Robert Jacobsen is permitted to travel from the San Francisco Bay Area to Escondido, California, from and including November 2, 2016, to and including November 9, 2016, solely for the purpose to visit and care for a close friend who is in the end stages of his battle with cancer.

DATED: November 2, 2016

  
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JUDGE NANDOR J. VADAS  
UNITED STATES MAGISTRATE JUDGE